

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

KML Law Group, P.C.
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Attorneys for Movant: THE BANK OF NEW YORK
MELLON FKA THE BANK OF NEW YORK,
SUCCESSOR INDENTURE TRUSTEE TO
JPMORGAN CHASE BANK, N.A., AS INDENTURE
TRUSTEE ON BEHALF OF THE NOTEHOLDERS OF
THE CWHEQ INC., CWHEQ REVOLVING HOME
EQUITY LOAN TRUST, SERIES 2006-C

In Re:

Karen Lambert aka Karen Leese
Debtor

Case No.: 18-21262 MBK

Chapter: 13

Adv. No.: _____

Hearing Date:

Judge: Michael B. Kaplan

**CERTIFICATION IN SUPPORT OF
MOTION FOR RELIEF FROM AUTOMATIC STAY**

I, MarieJune Dauz, declare under penalty of perjury as follows:

I. I am a/an Assistant Vice President of Bank of America, N.A., successor
by merger to BAC Home Loans Servicing, LP ("BANA") and am authorized to sign this
certification on behalf of BANA, as servicing agent for THE BANK OF NEW YORK MELLON
FKA THE BANK OF NEW YORK, SUCCESSOR INDENTURE TRUSTEE TO JPMORGAN

CHASE BANK, N.A., AS INDENTURE TRUSTEE ON BEHALF OF THE NOTEHOLDERS OF THE CWHEQ INC., CWHEQ REVOLVING HOME EQUITY LOAN TRUST, SERIES 2006-C ("Movant"), with respect to a certain loan (the "Loan") provided to Debtor(s), which Loan is evidenced by the Note (defined below) and secured by the Mortgage (defined below). This certification is provided in support of Movant's Motion for Relief from Stay (the "Motion").

2. As part of my job responsibilities for BANA, I have personal knowledge of and am familiar with the types of records maintained by BANA in connection with the Loan and the procedures for creating those types of records. I have access to the books, records and files of BANA that pertain to the Loan and extensions of credit given to Debtor(s) concerning the Property (defined below).

3. The information in this certification is taken from BANA's business records regarding the Loan. I have personal knowledge of BANA's procedures for creating these types of records. The records are: (a) made at or near the time of the occurrence of the matters recorded by persons with personal knowledge of the information in the business record, or from information transmitted by persons with personal knowledge; (b) kept in the course of BANA's regularly conducted business activities; and (c) it is the regular practice of BANA to make such records.

4. The Debtor(s) has/have executed and delivered or is/are otherwise obligated with respect to that certain promissory note in the original principal amount of \$100,000.00 (the "Note"). A copy of the Note is attached hereto as Exhibit A.

5. Pursuant to that certain Mortgage (Line of Credit), (the "Mortgage"), all obligations (collectively, the "Obligations") of the Debtor(s) under and with respect to the Note

and the Mortgage are secured by the Property (as defined in the Motion). A copy of the Mortgage is attached hereto as Exhibit B.

6. All rights and remedies under the Mortgage have been assigned to the Movant pursuant to that certain assignment of mortgage, a copy of which is attached hereto as Exhibit C.

7. As of March 25, 2022, the outstanding amount of the Obligations less any partial payments or suspense balance is \$84,053.38.

8. As of March 25, 2022, the per diem interest is \$8.3000.

9. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred legal fees and legal costs. Movant reserves all rights to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

10. The following chart sets forth the number and amount of postpetition payments due pursuant to the terms of the Note that have been missed by the Debtor(s) as March 25, 2022:


Number of Missed Payments	From	To	Monthly Payment Amount	Total Missed Payments
1	09/25/2021	09/25/2021	\$ 947.44	\$ 947.44
1	10/25/2021	10/25/2021	\$ 935.35	\$ 935.35
1	11/25/2021	11/25/2021	\$ 931.90	\$ 931.90
1	12/25/2021	12/25/2021	\$ 937.92	\$ 937.92
1	01/25/2022	01/25/2022	\$ 933.69	\$ 933.69
1	02/25/2022	02/25/2022	\$ 930.87	\$ 930.87
1	03/25/2022	03/25/2022	\$ 903.22	\$ 903.22
Less postpetition partial payments (suspense balance):			(\$888.89)	

Total: \$5,631.50

11. As of March 25, 2022, the date of the last payment received is March 08, 2022.

12. Attached hereto as Exhibit D, is the Certification Re Post-Petition Payment History on the Note and Mortgage.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of
the United States of America that the foregoing is true and correct. Executed this 14th day of
April, 2022.



Name: MarieJune Daus

Title: Assistant Vice President , Bank of America N.A.